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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Federal Communications Commission
Office of Secretary

In the Matter of)
)
Implementation of Section 25)
of the Cable Television Consumer)
Protection and Competition Act)
of 1992)
)
Direct Broadcast Satellite)
Public Service Obligations)

MM Docket No. 93-25

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Reply Comments of
CENTER FOR MEDIA EDUCATION
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NATIONAL ASSOCIATION OF ELEMENTARY SCHOOL PRINCIPALS
NATIONAL ASSOCIATION OF SCHOOL PSYCHOLOGISTS
NATIONAL COALITION ON TELEVISION VIOLENCE
NATIONAL WRITERS UNION, LOCAL 1981, UAW
PUBLIC ACCESS CORPORATION OF THE DISTRICT OF COLUMBIA
SELF HELP FOR HARD OF HEARING PEOPLE, INC.
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TABLE OF CONTENTS

SUMMARY AND INTRODUCTION

- I. DBS IS A THRIVING INDUSTRY CAPABLE OF SERVING THE PUBLIC
INTEREST BEYOND THE BARE MINIMUM SET FORTH IN SECTION 25 3
- II. THE DBS INDUSTRY CURRENTLY DOES NOT ADEQUATELY SERVE THE
NEEDS OF CHILDREN 4
- III. THE PROPOSAL OF CME, *et al.* WOULD NOT OVERLY BURDEN DBS
PROVIDERS 6

APPENDIX

SUMMARY AND INTRODUCTION

CME, *et al.* respectfully submit these Reply Comments regarding the implementation of Section 25 of the Cable Television Consumer Protection and Competition Act of 1992, which imposes public interest obligations on direct broadcast satellite ("DBS") services. In their original Comments, CME, *et al.* argued that the Commission should require direct broadcast satellite providers to serve the needs of their child audience as part of their public interest obligation under Section 25(a) of the 1992 Cable Act. To this end, CME, *et al.* proposed that the Commission should encourage the provision of children's educational and informational programming through guidelines for DBS providers and should place limitations on advertising during children's programming on DBS.

CME, *et al.* disagree with the arguments of the DBS industry that the Commission should impose no additional public interest obligations under Section 25(a) because DBS is still a nascent service and any additional obligations would prove onerous. This may have been the case in 1993, when the Notice of Proposed Rulemaking ("NPRM") was first issued, but the growth of the DBS industry since then shows it to be a thriving industry capable of providing public service beyond the bare minimum set forth in Section 25. Because DBS has firmly established itself in the marketplace, it is appropriate for the Commission to impose additional public interest obligations on DBS providers.

Attached to these Reply Comments is a study of children's educational and informational programming offered by DBS. While the DBS industry may argue that they already serve the needs of children adequately, this study shows this claim to be false. Unless the Commission enacts guidelines, it is likely that DBS providers will continue to devote only a small percentage of their channel capacity to children's educational and informational children's programming.

Further, the voluntary public service efforts cited in the DBS comments are either insufficient or irrelevant to the public interest obligations of DBS providers.

Several DBS industry commenters claim that any additional obligations under 25(a) would prove onerous. However, the proposal of CME, *et al.* is reasonable and would not impede the development of DBS. Indeed, the Children's Television Workshop and DAETC, *et al.* advocate a similar plan. DBS providers have substantial channel capacity, and with recent technological developments that may increase this capacity, airing the equivalent of three hours per channel per week of children's educational and informational programming should not be difficult. Moreover, because DBS and cable services offer much of the same programming, the proposed advertising limits may already be in effect for a substantial amount of children's programming on DBS.

I. DBS IS A THRIVING INDUSTRY CAPABLE OF SERVING THE PUBLIC INTEREST BEYOND THE BARE MINIMUM SET FORTH IN SECTION 25

DBS industry commenters argue that the Commission should impose no additional public interest obligations under Section 25(a).¹ They argue that DBS is still a nascent service and any additional obligations would prove onerous. This may have been the case in 1993, when the NPRM was first issued, but it is no longer true. With more than four million subscribers by the end of 1996,² DBS is no longer a fledgling industry.

In the four years since the Commission issued the NPRM, DBS subscribership has increased to the point that DBS systems have a higher combined subscribership than any other multichannel video program distributor ("MVPD") alternative to cable.³ Most observers predict continued growth for DBS, with DBS service accounting for more than 20% of all MVPD subscribers by the year 2000.⁴ In fact, the growth rate of DBS service since June 1994 has been so phenomenal that it is considered one of the most successful new consumer electronics product introductions in history.⁵

¹Supplemental Comments of DIRECTV, at 19; Comments of American Sky Broadcasting ("ASkyB"), at 9; Further Comments of Primestar Partners, LP ("Primestar"), at 11; Comments of Tempo Satellite, Inc. ("Tempo"), at 20; Further Comments of United States Broadcasting Co. ("USSB"), at 11.

²Further Comments of the Satellite Broadcasting and Communications Association ("SBCA"), at 2.

³*Status of Competition in the Market for Delivery of Video Programming, Third Annual Report*, CS Docket No. 96-133, December 26, 1996, at ¶38.

⁴*Id.*

⁵*Id.* at ¶40.

The DBS industry's own comments contradict the claim that it is a nascent service. DIRECTV boasts that DBS is "the main competitor to cable."⁶ The trade association for the DBS industry, the Satellite Broadcasting and Communications Association, states that "DBS has grown rapidly since its inception in 1994 and is providing increasing competition to the cable industry."⁷ American Sky Broadcasting chronicles the swift growth of DBS in its comments:

In the four years since Section 25 was enacted, the DBS industry has undergone dramatic and dynamic change. At the time the Commission initiated this proceeding, not a single part 100 DBS licensee had commenced operations, and the lone service provider operating from a satellite license under part 25 -- Primestar Partners LP -- offered only eleven channels of programming. Now there are five part 100 licensees and two operators providing DBS service from part 25 Ku-band satellites, offering hundreds of channels of digital-quality video programming to customers nationwide.⁸

The rapid development and deployment of DBS and the steadily increasing subscribership over the last few years show it to be a thriving industry capable of providing public service beyond the bare minimum set forth in Section 25. DBS has firmly established itself in the multichannel video programming marketplace. Therefore, it is appropriate for the Commission to impose additional public interest obligations on DBS providers.

II. THE DBS INDUSTRY CURRENTLY DOES NOT ADEQUATELY SERVE THE NEEDS OF CHILDREN

CME, *et al.* urge the Commission to require DBS providers to serve the public interest through the provision of children's educational and informational programming and by limiting

⁶Supplemental Comments of DIRECTV, at 3.

⁷Further Comments of SBCA, at 2.

⁸Comments of ASkyB, at 3-4.

advertising during children's programming.⁹ While the DBS industry may argue that they already serve the needs of children adequately, a study of programming currently offered shows this to be false.¹⁰ Absent regulation, DBS providers devote on average only a small portion of their channel capacity, usually less than 1%, to children's educational and informational programming.

As discussed in the comments of CME, *et al.*, there are significant market disincentives to the provision of children's educational and informational programming.¹¹ CME, *et al.* urge the Commission to counter these disincentives by establishing a "safe harbor," similar to the one recently established for conventional television broadcasters,¹² in which a DBS provider can be assured that it is meeting its public interest obligations regarding its child audience. CME, *et al.* recommend that any DBS service provider that devotes at least three hours per week per channel, or 3% of channel capacity, to children's educational and informational programming should fall within the safe harbor and receive staff level processing and review of its public interest obligations to children upon license renewal.¹³ Unless the Commission enacts guidelines such as these, it is likely that DBS operators will devote only a small amount of their system capacity to children's educational and informational children's programming.

⁹See generally, Comments of CME, *et al.*

¹⁰Appendix, Children's Educational and Informational Programming Offered by Direct Broadcast Satellite.

¹¹Comments of CME, *et al.* at 5.

¹²47 C.F.R. § 73.671, Note 2.

¹³Comments of CME, *et al.* at 7-8.

The voluntary efforts cited in the DBS industry comments are either insufficient or irrelevant to the public interest obligations of DBS providers. Primestar Partners, LP and United States Satellite Broadcasting Company claim that DBS providers are already involved in a variety of public service undertakings voluntarily, without regulation.¹⁴ However, these acts of self-promotion, e.g., free DBS installation and service to "Ronald McDonald" houses,¹⁵ or corporate charity, e.g., donations to the American Red Cross,¹⁶ are separate and distinct from serving the public interest as a broadcaster. However commendable, these types of activities should not count toward fulfilling the public interest requirements of DBS providers.

III. THE PROPOSAL OF CME, *et al.* WOULD NOT OVERLY BURDEN DBS PROVIDERS

Several DBS industry commenters claim that any additional obligations under 25(a) would prove onerous.¹⁷ However, the proposal of CME, *et al.* is reasonable and would not impede development of the DBS industry. The "safe harbor" guideline for DBS providers proposed by CME, *et al.* are based on the *1996 Children's Programming Rules*. In that Order, the Commission determined that three hours per week per channel was a reasonable guideline that would not overly burden conventional broadcasters, but would encourage them to provide

¹⁴Further Comments of Primestar, at 11; Comments of USSB, at 2.

¹⁵Further Comments of Primestar, at 11.

¹⁶*Id.*

¹⁷*Id.*; Comments of DIRECTV, at 2; Comments of Tempo, at 4.

more children's educational and informational programming.¹⁸ The same standard of three hours per week per channel should also encourage, but not overly burden DBS providers.

DBS providers already air some educational and informational programming, but, as stated above, it is not equivalent to the amount aired by conventional television broadcasters. DBS providers have a much larger channel capacity than conventional television broadcasters, and with recent technological developments that may increase this capacity, airing the equivalent of three hours per channel per week of children's educational and informational programming should not be difficult for DBS providers.

Moreover, advertising limits and prohibition of "host-selling" and program length commercials would not encumber DBS providers. Rules concerning these practices are already in effect for conventional broadcasters and cable service providers.¹⁹ Adopting these rules will level the playing field²⁰ and prevent overcommercialization of DBS children's programming. In addition, because DBS and cable services offer much of the same programming, the proposed

¹⁸*Policies and Rules Concerning Children's Television Programming, Revision of Programming Policies for Television Broadcast Stations, Report and Order*, MM Docket No. 93-48, August 8, 1996, at ¶121.

¹⁹47 C.F.R. § 73.670 (limiting advertising during children's programming); *Children's Television Report and Policy Statement*, 50 FCC 2d 1 (1974), 55 FCC 2d 691 (1975), *aff'd* ACT v. FCC, 564 F.2d 458 (D.C. Cir. 1977) (prohibiting "host-selling" and "lead in/lead out" advertising during children's programming, and requiring adequate separation between commercial and program matter).

²⁰The cable industry has used this proceeding to suggest leveling the playing field through relaxation of its own public interest requirements. Comments of National Cable Television Association, at 4, Comments of Time Warner Cable, at 11, Comments of U.S. West, at 4. The issue here is the appropriate public interest obligations for DBS. The pleas of the cable industry are irrelevant to this proceeding and should be ignored by the Commission.

advertising limits may already be in effect for a substantial amount of children's programming provided by DBS services.

CME, *et al.* are not the only commenters to suggest that the Commission should require DBS providers to serve the needs of children as part of their public interest obligations. Commenters such as the Children's Television Workshop, DAETC, *et al.* and Encore Media Corporation also recognize the need for more children's educational and informational programming on DBS.²¹ Similar to CME, *et al.*, the Children's Television Workshop and DAETC, *et al.* suggest that the Commission require DBS providers to set aside a certain percentage of their channel capacity for children's educational and informational programming.²² The Commission should heed the arguments of CME, *et al.* and others and include service to children as part of the public interest requirements of DBS providers.

CONCLUSION

DBS is a thriving industry capable of serving the public interest beyond the bare minimum set forth in Section 25. The Commission should require DBS providers to serve the needs of their child audience as part of their public interest obligation under Section 25(a). By setting up guidelines that encourage the provision of children's educational and informational programming and imposing advertising limits, the Commission can help safeguard the interests of children.

²¹See generally Comments of Children's Television Workshop; Comments of DAETC, *et al.*; Comments of Encore Media Corporation.

²²Comments of Children's Television Workshop, at 3; Comments of DAETC, *et al.*, at 7.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "L. Dolqueist", with a long horizontal flourish extending to the right.

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APPENDIX

CHILDREN'S EDUCATIONAL AND INFORMATIONAL PROGRAMMING OFFERED BY DIRECT BROADCAST SATELLITE SERVICES

LaTanya Bailey Jones¹

The purpose of this study is to assess how much of the programming capacity of direct broadcast satellite ("DBS") providers is currently used to serve the educational and informational needs of children. The results show that DBS providers use only a small portion of their programming capacity, usually less than 1%, to serve the educational and informational needs of children.

METHODOLOGY

This study examined the programming offered by DirecTV and USSB for the week of April 6-12, 1997.² It used as a guide the definition of core educational and informational programming set forth for conventional television broadcasters in the 1996 Children's Programming Rules. Under the FCC rules,

[E]ducational and informational television programming is any television programming that furthers the educational and informational needs of children 16 years of age and under in any respect, including the child's intellectual/cognitive or social/emotional needs. . . . Core Programming is educational and informational programming that satisfies the following additional criteria:

¹LaTanya Bailey Jones is a media consultant. She received a B.A. from Yale University and has worked extensively in public and commercial television. She recently served as Director of the Maryland Campaign for Kid's TV. Patricia Aufderheide, Associate Professor, School of Communication, the American University, Washington, D.C., supervised the research for this study.

²Programming available on network broadcast channels such as NBC, ABC and PBS was not included because network broadcast channels are only available to the small number of DBS subscribers that have not subscribed to cable in the last 90 days and cannot receive their local networks off-air.

- (1) It has serving the educational and informational needs of children ages 16 and under as a significant purpose;
- (2) It is aired between the hours of 7:00 a.m. and 10:00 p.m.;
- (3) It is a regularly scheduled weekly program;
- (4) It is at least 30 minutes in length;
- (5) The educational and informational objective and the target child audience are specified in writing in the licensee's Children's Television Programming Report, as described in §73.3526(a)(8)(iii); and
- (6) Instructions for listing the program as educational/informational, including an indication of the age group for which the program is intended, are provided by the licensee to publishers of program guides, as described in §73.673(b).³

The study used the listings guide, *Satellite Direct*,⁴ to determine the length of each program, the time it aired, and whether or not it was regularly scheduled. Because DBS providers, unlike conventional television broadcasters, are not required to identify the educational and informational objectives and target age of their children's programming, the *KIDSNET Media Guide*⁵ was used as a supplement to determine whether these programs had as a significant purpose serving the educational and informational needs of children. The programs that fell under the curriculum areas of art, history, science, economics, math, social sciences, wildlife, technology, literature, reading, and early childhood development and foreign language

³47 C.F.R. § 73.671(c).

⁴Volume 4, Number 1, April 1997.

⁵*KIDSNET Media Guide*, published by KIDSNET, 6856 Eastern Avenue, NW, Suite 208, Washington, DC 20012, 202-291-1400, Editor Elizabeth Myhre, Executive Director Karen Jaffe. KIDSNET is a national clearinghouse and information center devoted to children's television, radio, audio, video and multimedia. The *Media Guide* is published monthly and describes programming referenced by air date, curriculum areas, grade levels and off-air taping rights.

were deemed to be educational and informational for the purpose of this study.⁶ These programs are listed on Chart 1.

The number of available programming hours was determined within the time frame of 7:00am to 10:00pm, since conventional broadcasters must air their children's educational and informational programming during this fifteen hour period. The total programming capacity was calculated by multiplying the number of channels of each DBS provider by fifteen hours per day by seven days per week. The study counted all DBS channels used for video transmission, including pay-per-view channels. Audio channels offered by DBS providers were excluded. The number of children's educational and informational programming hours per week was divided by the number of available programming hours to determine the percentage of programming capacity devoted to the educational and informational needs of children. The number of available programming hours, hours of children's educational and informational programming, and percentage of programming capacity used for children's educational and informational programming for each DBS provider is shown on Chart 2.

Although only listings for DirecTV/USSB were used in this study, it is possible to estimate the amount of children's educational and informational programming offered by other DBS providers using this information. If the programming aired on each particular channel is the same for all DBS providers, then the six hours of children's educational and informational programming aired on A&E on DirecTV, for example, should be the same six hours aired on EchoStar, Alphastar and Primestar. By comparing the amount of children's educational and informational programming provided by certain channels over the space of one week with the

⁶This study does not claim that these programs meet the FCC criteria for children's educational and informational programming.

channels offered by various DBS providers, it is possible to estimate the amount programming capacity devoted to children's educational programming by DBS providers other than DirecTV and USSB.

SUMMARY OF RESULTS

The results of this study show that all DBS providers except USSB use only 1% or less of their programming capacity for children's educational and informational programming. USSB devotes the largest portion of its programming capacity, 1.7%, to children's educational and informational programming. However, USSB offers only twenty-two channels. EchoStar, with 107 channels, uses .90% of its programming capacity. Alphastar and Primestar use smaller portions, .52% and .62%, respectively. DirecTV offers the lowest amount, with only .34% of programming capacity used for children's educational and informational programming, although if DirecTV is combined with USSB, as it is by many subscribers, this figure rises to .44%.

In comparison, to meet their public interest requirements, conventional television broadcasters devote three hours per channel per week, or 3% of their programming capacity, to children's educational and informational programming.⁷ Despite their significantly larger programming capacity, DBS providers do not even approach this level of service to the educational and informational needs of children.

⁷47 C.F.R. § 73.671, Note 2.

CHART ONE

	PROGRAM NAME	AIR DAY & TIME	DURATION	HOURS/ WEEK	TOTAL
A&E	Biography for Kids Classroom	Sa, 10-11am M-F, 7-8am	1.0 1.0	1.0 5.0	6.0
ANIMAL PLANET	Acorn: The Nature Hut Madison's Adventures Mother's Nature	M-Su, 10-10:30 am M-Su, 9-9:30am M-Su, 9:30-10am	0.5 0.5 0.5	3.5 3.5 3.5	10.5
CARTOON NETWORK	Big Bag Captain Planet Dexter's Lab Small World	Su, 7-8am, Su, 9-10am Sa, 3:30-4pm Su, 3:30-4pm, Sa, 9:30-10am Su, 8-9am	1.0, 1.0 0.5 0.5, 0.5 1.0	1.0, 1.0 0.5 1.0 1.0	4.5
DISCOVERY	Assignment Discovery	M-F, 9-10am	1.0	5.0	5.0
DISNEY	Adventures in Wonderland Audobon Amazing Animals Ocean Girl Really Wild Animals	M-F, 10-10:30am Sa-Su, 9:30-10am Sa-Su, 8:30-9am Sa-Su, 3-3:30pm Sa-Su, 9-9:30am	0.5 0.5 0.5 0.5 0.5	2.5 1.0 1.0 1.0 1.0	6.5
ENCORE - WAM!	F.R.O.G. Global Family Leonard Bernstein's Young People's Concerts Mathematical Eye Mission Reading Musical Factory Press Gang Scientific Eye Sky Trackers Swallows & Amazons World Youth News	M-F 7-7:30am M-F 9:30-10am Su, 6-7pm M-F, 12:30-1pm M-F, 11-11:30am M-F, 8:30-9am Sa, 1:00-1:30pm M-F 12pm-12:30pm Sa, 12:30-1pm M-Th, 11:30am-12pm M-F, 9-9:30am	0.5 0.5 1.0 0.5 0.5 0.5 0.5 0.5 0.5 0.5 0.5 0.5	2.5 2.5 1.0 2.5 2.5 2.5 0.5 2.5 0.5 2.0 3.5	22.5
FAMILY CHANNEL	Big Brother Jake Jack Hanna's Animal Adventures Wild Animal Games	Sa, 9-9:30am Su, 9-9:30am Sa, 8-8:30am, Sa, 8:30-9am	0.5 0.5 0.5 0.5	0.5 0.5 1.0	2.0
HBO	Animated Hero Classics Shakespeare: Animated Tales Testament: The Bible in Animation	Sa-Su, 8:30-9am Sa, 7:30-8am Sa-Su, 8-8:30am	0.5 0.5 0.5	0.5 0.5 1.0	2.5

	PROGRAM NAME	AIR DAY & TIME	DURATION	HOURS/ WEEK	TOTAL		
HISTORY	Classroom	M-F, 8-9am	1.0	5.0	11.0		
	Christopher Columbus	Su, 9-9:30am	0.5	0.5			
	Inspector Gadget	Sa-Su, 10-10:30am, Su, 7-7:30pm, Su, 7:30-8pm	0.5 0.5 0.5	2.0			
	On Campus	Su, 8-9am	1.0	1.0			
	Once Upon a Time	Sa-Su, 9:30-10am, Sa, 9-9:30am	0.5 0.5	1.5			
	Year by Year Kids	Sa-Su, 10:30-11am	0.5	1.0			
	THE LEARNING CHANNEL	Ready, Set, Learn!	M-F, 7-11am	4.0		20.0	20.0
		NICKELODEON	Allegra's Window	M-F, 11-11:30am		0.5	2.5
Are You Afraid of the Dark?	Su, 6-6:30pm, M-F, 5-5:30pm		0.5 0.5	3.0			
Blue's Clue's	M-F, 12:30-1pm		0.5	2.5			
Gullah Gullah Isle	M-F, 11:30am-12pm		0.5	2.5			
Inspector Gadget	M-F, 4:30-5pm		0.5	2.5			
Little Bear	M-F, 12-12:30pm		0.5	2.5			
Nick News	Su, 8:30-9pm		0.5	0.5			
Muppet Babies	Su, 8-8:30am, M-Sa, 10:30- 11am		0.5 0.5 0.5	6.5			
Papa Beaver	M-F, 3:30-4pm		0.5	2.5			
Richard Scarry	Sa, 10-10:30am		0.5	5.0			
Rugrats	M-F, 1:30-2pm		0.5	5.0			
	M-F, 9:30-10am, M-F, 1-1:30pm		0.5 0.5	6.0			
	Su, 10-10:30am, M-F, 9:30-10am		0.5 0.5	0.5			
	M-F, 7:30-8pm		0.5				
Wubbulous World of Dr. Seuss	Sa, 8:30-9am		0.5				
	Su, 8-8:30pm						
TBS	Captain Planet		Sa-Su, 7:30-8am	0.5	1.0	1.0	

CHART TWO

	DirecTV	USSB	DirecTV USSB	ALPHASTAR	ECHOSTAR	PRIMESTAR
Total # channels	249	22	271	173	107	143
Total Available Programming Hours Between 7am-10pm (channel # x 15 hours x 7 days)	26,145	2,310	28,455	18,165	11,235	15,015
Total hours of children's programming on all channels between 7am-10pm	<i>A&E -- 6</i> <i>Animal Planet -- 10.5</i> <i>Cartoon -- 4.5</i> <i>Discovery -- 5</i> <i>Disney -- 6.5</i> <i>Family -- 2</i> <i>History -- 11</i> <i>TLC-- 20</i> <i>TBS -- 1</i> <i>WAM! -- 22.5</i> <div align="center">-----</div> TOTAL -- 89 <div align="center">-----</div>	<i>HBO -- 2.5</i> <i>Nickelodeon -- 36</i> <div align="center">-----</div> TOTAL -- 38.5 <div align="center">-----</div>	<i>A&E -- 6</i> <i>Animal Planet -- 10.5</i> <i>Cartoon -- 4.5</i> <i>Discovery -- 5</i> <i>Disney -- 6.5</i> <i>Family -- 2</i> <i>HBO -- 2.5</i> <i>History -- 11</i> <i>TLC-- 20</i> <i>Nickelodeon -- 36</i> <i>TBS -- 1</i> <i>WAM! -- 22.5</i> <div align="center">-----</div> TOTAL -- 127.5 <div align="center">-----</div>	<i>A&E -- 6</i> <i>Cartoon -- 4.5</i> <i>Discovery -- 5</i> <i>Disney -- 6.5</i> <i>Family -- 2</i> <i>HBO -- 2.5</i> <i>History -- 11</i> <i>TLC-- 20</i> <i>Nickelodeon -- 36</i> <i>TBS -- 1</i> <div align="center">-----</div> TOTAL -- 94.5 <div align="center">-----</div>	<i>A&E -- 6</i> <i>Animal Planet -- 10.5</i> <i>Cartoon -- 4.5</i> <i>Discovery -- 5</i> <i>Disney -- 6.5</i> <i>Family -- 2</i> <i>HBO -- 2.5</i> <i>History -- 11</i> <i>TLC-- 20</i> <i>Nickelodeon -- 36</i> <div align="center">-----</div> TOTAL -- 105 <div align="center">-----</div>	<i>A&E -- 6</i> <i>Cartoon -- 4.5</i> <i>Discovery -- 5</i> <i>Disney -- 6.5</i> <i>Family -- 2.0</i> <i>HBO -- 2.5</i> <i>History -- 11</i> <i>Learning -- 20</i> <i>Nickelodeon -- 36</i> <i>TBS -- 1.0</i> <div align="center">-----</div> TOTAL --94.5 <div align="center">-----</div>
% devoted to children's educational/informational programming	0.34%	1.75%	0.44%	0.52%	0.90%	0.62%